

**IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS, EASTERN DIVISION**

US METRO BANK)
)
)
Plaintiff,) Case No. 24-cv-3526
)
)
v.) Judge Jorge L. Alonso
3511-15 RAVENSWOOD LLC, A FRESH)
START SOBER LIVING ENVIRONMENTS,)
INC., LEONID GOLDFARB a/k/a LENNY)
GOLDFARB, 2147 WEST BELMONT)
CORPORATION, 2310 WEST BELMONT)
CORPORATION, 3818 N DAMEN LLC,)
and 2320 W ADDISON LLC,)
)
Defendants.)

**PLAINTIFF'S RENEWED MOTION FOR ENTRY OF
JUDGMENT OF FORECLOSURE AND SALE
PURSUANT TO 735 ILCS 5/15-1506**

NOW COMES the Plaintiff, US Metro Bank (“Plaintiff”), by and through its attorneys, McFadden Dillon & Gattone, P.C., and moves this Court pursuant to 735 ILCS 5/15-1506 for entry of Judgment of Foreclosure and Sale (Count I). In support thereof, Plaintiff states as follows:

INTRODUCTION

1. Plaintiff initiated this action on May 1, 2024 by filing its Complaint to Foreclose Mortgage and for Other Relief (the “Complaint”) against the defendants, 3511-15 Ravenswood LLC (“3511-15 Ravenswood”), A Fresh Start Sober Living Environments, Inc. (“Fresh Start”), Leonid Goldfarb a/k/a Lenny Goldfarb (“Goldfarb”), 2147 West Belmont Corporation (“2147 W Belmont”), 2310 West

Belmont Corporation (“2310 W Belmont”), 3818 N Damen LLC (“3818 N Damen”), and 2320 W Addison LLC (“2320 W Addison”) (all collectively the “Defendants”).

2. By its Complaint, Plaintiff seeks, *inter alia*, to foreclose the Mortgage dated July 14, 2023 (the “Mortgage”), executed by Goldfarb as the duly authorized and sole member of 3511-15 Ravenswood pledging the property known as 3511-3515 North Ravenswood Avenue, Chicago, Illinois 60657-1013 (the “Property”).

5. The Mortgage was granted to secure the indebtedness arising under a Promissory Note executed by 3511-15 Ravenswood and Fresh Start in favor of Plaintiff in the original amount of \$4,830,000.00 (the “Note”).

6. Plaintiff seeks by its Complaint to terminate the possessory interests of the Defendants.

7. In support of this Motion, Plaintiff relies upon Plaintiff’s Renewed Motion for Summary Judgment Pursuant to FRCP 56, Plaintiff’s Memorandum of Law in Support of its Renewed Motion for Summary Judgment, Plaintiff’s Renewed Motion for Default Judgment Pursuant to FRCP 55(b), Plaintiff’s Updated Statement of Material Facts Pursuant to LR 56.1(a)(3), the Supplemental Affidavit of Proof, all filed concurrently with this Motion, and the previously filed Affidavit of Proof (Doc. #40).

WHEREFORE, the Plaintiff, US Metro Bank, respectfully requests that this Honorable Court (i) grant its Renewed Motion for Judgment of Foreclosure and enter a Judgment of Foreclosure and Sale on Count I of the Complaint to Foreclose Mortgage and for Other Relief against all defendants: 3511-15 Ravenswood LLC, A Fresh Start Sober Living Environments, Inc., Leonid Goldfarb a/k/a Lenny Goldfarb,

2147 West Belmont Corporation, 2310 West Belmont Corporation, 3818 N Damen LLC, and 2320 W Addison LLC; (ii) award US Metro Bank, pursuant to the terms and provisions of the Note and Mortgage, its costs and expenses, including reasonable attorneys' fees necessarily incurred by Plaintiff in enforcing its rights arising under the Note and Mortgage; (iii) award the relief prayed in the Complaint to Foreclose Mortgage and for Other Relief and established in the proofs before the Court; and (iv) grant such further and additional relief as the Court may deem just and proper.

Respectfully submitted,

/s/ Wendy Kaleta Gattone
One of the attorneys for the Plaintiff,
US Metro Bank

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